



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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August 7, 2007

Ref: EPR-N

Robert Thompson
District Ranger
Mystic Ranger District, Black Hills National Forest
8221 South Highway 16
Rapid City, SD 57702

RE: Mitchell Project Final EIS comments
CEQ# 20070263

Dear Mr. Thompson:

The U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the *Final Environmental Impact Statement* (DEIS) for the Mitchell project. The Forest Service proposes to aggressively manage vegetation to minimize the potential for large-scale wildfires. Specifically, the primary focus is to reduce the potential for uncontrolled crown fire spread within the wildland-urban interface and near at-risk communities by removing vegetation. The project would implement forest thinning on about 10,600 acres, create fuel breaks along private property boundaries and road corridors on about 500 acres, and reduce pine encroachment into historic meadow on about 1,400 acres. Prescribed burning is also proposed on about 9,000 acres. EPA provides these comments in accordance with our authorities and responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

EPA supports the proposed project's purpose and need to help protect local communities and resources from catastrophic wildfire, and restore resource conditions to a healthy, resilient fire-adapted ecosystem across the project area. In general, EPA finds the Final EIS responsive to our concerns about air and water quality, wetlands, noxious and invasive weeds, and wildlife habitat. We appreciate the additional information regarding the Simple Approach Estimation Model to determine whether prescribed burning will cause any exceedances at any of the local sensitive receptors. Appendix B also provides a list of design criteria for minimizing smoke impacts to the public, and the FEIS states that no violations or complaints have been attributed to National Forest project activities. The FEIS also explains that smoke from prescribed fires are not likely to reduce visibility in federally designated Class I areas (Badlands Wilderness and/or Wind Cave National Park), and any identified impacts will be mitigated during site-specific burn planning.

We are encouraged by the Black Hills' provision of a limited amount of wood material (chips and byproduct) to the pilot cellulosic ethanol plant in Upton, SD. EPA supports this sustained commodity use of the forest to provide base material for the plant and would like to see the effort expanded to address the accumulation of slash piles and their associated fuel load. While on a site tour in October 2006, EPA observed numerous large slash piles on the Forest that seemingly could be removed and converted to ethanol.

Overall, EPA commends the Forest Service for its comprehensive FEIS analysis and disclosure regarding the different aspects of the project. The additional narrative discussion will improve public understanding of the impacts from the proposed activities. We appreciate the opportunity to review and provide comments during the NEPA process. If you have any questions, please contact Jody Ostendorf of my staff at 303 312-7814.

Sincerely,

/s/ Larry Svoboda
Director, NEPA Program
Office of Ecosystems Protection and Remediation